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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED

NOV 18 2014

CLERK'S OFFICE-DETROIT
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

Indictment No. 06-20663-15

v.

Honorable Avern Cohn

ROBERT SILLS,

Defendant.

MOTION FOR REDUCTION OF SENTENCE UNDER
18 U.S.C. SECTION 3582(c)(2)

The defendant, ROBERT SILLS, pro se, pursuant to 18 U.S.C. Section 3582(c)(2), requests a reduction of sentence based on retroactive Guideline Amendment 782 (effective November 1, 2014), for the reasons set forth below:

I. JURISDICTION

The Court has jurisdiction over the instant motion under Section 3582(c)(2) because it is based on retroactive Guideline Amendment 782, which lowered the defendant's sentencing range in effect at the time of the original sentencing on June 28, 2010.

II. REASONS FOR GRANTING A SENTENCE REDUCTION UNDER
SECTION 3582(c)(2)

1. The defendant's guideline range at the time of sentencing on June 28, 2010, was 121 to 151 months, based on "an Offense Level of 32 and a Criminal History Category of I". (Sentencing Transcript at p. 3). Amendment 782 reduces the

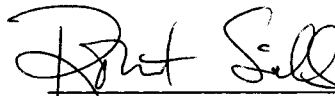
defendant's Offense Level to 30, yielding a guideline range of 97 to 121 months.

2. The defendant has made significant efforts toward post-conviction rehabilitation, completing a number of programs offered by the Bureau of Prisons, such as, Creative Business, Employment Opportunity, Heating and Air-Conditioning, Vocational Training, Pre-Release Anger Management, Pre-Release Anxiety Management, and Commercial Driving License (CDL) Course. (See Exhibit A, attached). The Supreme Court held in Pepper v. United States, 562 U.S. ____ (2011), that post-conviction rehabilitation is an approved ground for a reduction of sentence.

III. CONCLUSION

The defendant requests that the Court grant his request for reduction of sentence and impose a sentence at the bottom of his guideline range based on his continuing effort at postconviction rehabilitation.

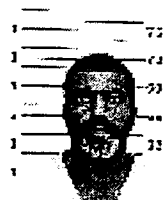
Respectfully submitted,



ROBERT SILLS, Pro Se
33½ Pembroke Road
Danbury, CT 06811

Dated: November 12, 2014

DEFENDANT'S EXHIBIT A



Name: SILLS, ROBERT
 Register Number: 33957-044
 Security/Custody: LOW/IIN
 Projected Release: 06-15-2029 / GCT REL
 Institution: DANBURY FCI
 ROUTE 37
 DANBURY, CT 06811
 Telephone: (203) 743-6471
 Fax: 700-642-9071

Next Review Date:
 Next Custody Review Date: 03-26-2015
 Age/DOB/Sex: 40 / 08-18-1973 / M
 CIM Status: Y
 Profile Comments:
 Driver's License/State: /
 FBI Number: 405069MA2
 DCDC Number:
 INS Number:

| EDUCATION DATA | | | | | | |
|--|------------|-----------------------------|-----------------|--------------|------|-------|
| Facility | Assignment | Description | Start Date | Stop Date | | |
| DAN | GED HAS | COMPLETED GED OR HS DIPLOMA | 11-28-2011 | CURRENT | | |
| DAN | ESL HAS | ENGLISH PROFICIENT | 11-28-2011 | CURRENT | | |
| COMPLETED EDUCATION COURSES | | | | | | |
| Course Description | | | Completion Date | Course Hours | | |
| CREATIVE BUSINESS RPPCT6 | | | 03-18-2014 | 18 | | |
| EMPLOY OPPORTUNITY T,TH RPPCT2 | | | 12-19-2013 | 36 | | |
| HVAC V/T 12:30-3:30PM RPP CT2 | | | 02-05-2013 | 230 | | |
| PRERELEASE ANGER MANAGEMENT | | | 01-02-2013 | 12 | | |
| PRERELEASE ANXIETY MANAGEMENT | | | 10-16-2012 | 12 | | |
| CDL,TUE&WED, 1830-2030 CT2 | | | 02-01-2012 | 16 | | |
| HIGH TEST SCORES | | | | | | |
| Test | Subtest | Score | Test Date | Test Faci | Form | State |
| Inmate has no score history items in this area | | | | | | |

| WORK DATA | | | | |
|--------------|------------|-----------------------------|------------|------------|
| Facility | Assignment | Description | Start Date | Stop Date |
| DAN | REC PM | REC ORDERLY/AIDE PM SHIFT | 07-15-2014 | CURRENT |
| WORK HISTORY | | | | |
| Facility | Assignment | Work Assignment Description | Start Date | Stop Date |
| CAA | H/O UNASSG | HOLD OVER UNIT | 06-16-2014 | 06-17-2014 |
| BML | EDUC | EDUCATION | 09-05-2013 | 05-28-2014 |

| DISCIPLINE HISTORY | | | | |
|---|--------------|------------|------------------------------|----------|
| UDC / DHO | Hearing Date | Report No. | Prohibited Act / Description | Sanction |
| Inmate has no disciplinary history items in this area | | | | |

PROOF OF SERVICE

This is to certify that a copy of the foregoing Motion For Reduction of Sentence Under 18 U.S.C. Section 3582(c)(2) has been mailed to Michael C. Leibson, Asst. U.S. Attorney, 211 W. Fort Street, #2300, Detroit, MI 48226, this 12th day of November, 2014.



ROBERT SILLS



⇨ 33957-044 ⇨
Clerks Office
Theodore Levin
231 W Lafayette BLVD
Room 564
Detroit, MI 48226
United States

FEDERAL CORRECTIONAL INSTITUTION DANBURY
33 1/2 PEMBROKE ROAD, DANBURY CT, 06811

DATE:

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IN ORIGINATOR OR CLERK LOCATION IF THE WRITER
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TO ANOTHER ADDRESS. PLEASE RETURN
THE ENCLOSURES TO THE ABOVE ADDRESS.